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Distribution of Hand Bills and Circulars Barred.—An ordinance of New York, which should be of interest to every American City energetic in keeping its streets and public places clean and free from being littered with hand bills and advertisements, is construed in a test case brought before the City Magistrate's Court of New York City entitled *People v. Horwitz*, 140 New York Supplement, 437. The ordinance reads: "That no person shall throw, cast, or distribute in or upon any of the streets, avenues, or public places, or in front yards or stoops, any hand bills, circulars, cards, or other advertising matter whatsoever." As to its validity the court holds that the ordinance does not violate the constitution providing that no person shall be deprived of liberty without due process of law, for a municipality through its legislative body has the right to prohibit the use of the streets for any purposes detrimental to the common good or that may conflict or interfere with the rights of others in the enjoyment of the highways, which should be unincumbered and clean so as to promote the safety, health, and comfort of the public. It is further held that it is not necessary to a conviction that the objectionable matter be cast or thrown away so that the streets be littered with it, for the act of distribution in itself is a complete offense separate from the act of throwing.

Actionable Shadowing.—Is any personal right violated by openly and publicly following and watching one, which practice is commonly called shadowing? In *Schulz v. Frankfort Marine Accident & Plate Glass Insurance Company*, 139 Northwestern Reporter, 386, plaintiff, who had been a witness adverse to defendants in an action, alleged that he was openly shadowed and followed for the purpose of annoying and intimidating him in order to get him to leave the city and refrain from testifying in the case if a new trial should be granted therein; that he was kept under constant surveillance; and that detectives set to watch and to eavesdrop at his home threatened him with violence and induced his employer to discharge him. It also appeared that they gave out to plaintiff's neighbors that he was being shadowed, and made themselves conspicuous by passing up and down on the sidewalk in front of his house and followed him at all times and places. In the above-entitled action plaintiff claims that by reason of these wrongful acts he was put in great fear, was prevented from coming and going as he pleased, and his reputation and good names defamed to his injury in the sum of \$5,000. A verdict was directed for defendant. Upon appeal the Supreme Court of Wisconsin holds that actual pursuit and public surveillance of person and home are suggestive of criminality fatal to public esteem and productive of public contempt or ridicule, so on this ground a case was made for the jury. Judgment is reversed.